UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.) Criminal No. 1:21-cr-10256-RWZ
KINGSLEY R. CHIN,)
ADITYA HUMAD, and)
SPINEFRONTIER, INC.,)
)
Defendants)

JOINT STATUS REPORT AND REQUEST TO CONTINUE STATUS CONFERENCE

The parties hereby file the following status report prepared in connection with the status conference scheduled for March 2, 2023.

Counsel for the defendants submitted discovery requests to the government on February 28, 2023. *See* Dkt. Nos. 95, 96. The government anticipates responding within 14 days as required by Local Rule 116.3(a).

To allow the parties sufficient time to meet and confer in order to resolve or narrow issues of disagreement regarding the defendants' discovery requests, the parties respectfully propose that any discovery motions be filed no later than April 28, 2023, that oppositions to any discovery motions be filed 14 days thereafter on May 12, 2023 and that a status conference and/or motion hearing be set thereafter to resolve any outstanding discovery disputes.

Counsel for Defendant Humad has a conflict on March 2, 2023. In light of the discovery requests and the conflict for counsel for Defendant Humad, the parties request that the status conference set for March 2, 2023 be postponed and a status conference and/or motion hearing be scheduled not earlier than May 12, 2023.

All time has been excluded under the Speedy Trial Act from the date of the defendants' arraignments through March 2, 2023. The parties request that the Court exclude time between March 2, 2023, and the date of the next hearing or conference in the interests of justice.

Respectfully submitted,

KINGSLEY R. CHIN

By his attorneys,

/s Josh L. Solomon
Josh L. Solomon
Barry S. Pollack
POLLACK SOLOMON DUFFY LLP
31 St. James Avenue, Suite 940
Boston, MA 02116
(617) 439-9800
jsolomon@psdfirm.com
bpollack@psdfirm.com

ADITYA HUMAD

By his attorneys,

/s/ Daniel N. Marx Daniel N. Marx William W. Fick FICK & MARX LLP 24 Federal Street, 4th Floor

Boston, MA 02110 857-321-8360 dmarx@fickmarx.com wfick@fickmarx.com

SPINEFRONTIER, INC.

By its attorneys,

/s Josh L. Solomon

Josh L. Solomon
Barry S. Pollack
POLLACK SOLOMON DUFFY LLP
31 St. James Avenue, Suite 940
Boston, MA 02116
(617) 439-9800
jsolomon@psdfirm.com
bpollack@psdfirm.com

Dated: February 28, 2023

UNITED STATES OF AMERICA,

By its attorney,

RACHAEL S. ROLLINS United States Attorney

/s/ Christopher Looney
PATRICK CALLAHAN
DAVID J. DERUSHA
ABRAHAM R. GEORGE
CHRISTOPHER LOONEY
Assistant U.S. Attorneys
1 Courthouse Way
John Joseph Moakley U.S. Courthouse
Boston, MA 02210
(617) 748-3100
Christopher.Looney@usdoj.gov

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Christopher Looney
Christopher Looney
Assistant United States Attorney

Dated: February 28, 2023